

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF NEW YORK

|                                 |   |                    |                               |
|---------------------------------|---|--------------------|-------------------------------|
| <b>UNITED STATES OF AMERICA</b> | ) | Criminal No.       | <u>1:23-cr-74 MAD</u>         |
|                                 | ) |                    |                               |
| <b>v.</b>                       | ) | <b>Information</b> |                               |
|                                 | ) |                    |                               |
| <b>ASHLEY MCCLOSKEY,</b>        | ) | Violation:         | 18 U.S.C. § 1952(a)(3)        |
|                                 | ) |                    | [Use of Interstate Commerce   |
| <b>Defendant.</b>               | ) |                    | to Promote Unlawful Activity] |
|                                 | ) |                    |                               |
|                                 | ) | 1 Count            |                               |
|                                 | ) |                    |                               |
|                                 | ) | County of Offense: | Albany                        |

**THE UNITED STATES ATTORNEY CHARGES:**

**COUNT 1**

**[Use of Interstate Commerce to Promote Unlawful Activity]**

From at least 2019 through May 8, 2020, in Albany County in the Northern District of New York, and elsewhere, the defendant, **ASHLEY MCCLOSKEY**, did use and cause to be used facilities in interstate and foreign commerce, with intent to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on of an unlawful activity, and thereafter performed and attempted to perform an act to promote, manage, establish, and carry on, and to facilitate the promotion, management, establishment and carrying on of such unlawful activity, in that the defendant used cellular phones, the Internet, and caused others to use her vehicle to travel interstate to promote, manage, establish, and carry on a criminal business enterprise engaged in sex trafficking and promoting prostitution in violation of New York State Penal Law Sections 230.20 and 230.34. All in violation of Title 18, United States Code, Section 1952(a)(3).

Dated: February 23, 2023

CARLA B. FREEDMAN  
United States Attorney

By: /s/ Katherine Kopita  
Katherine Kopita  
Assistant United States Attorney  
Bar Roll No. 517944